

Solbridge
(Hereinafter referred to as “the Company”,
“We,” “Us”, “Our”)

<http://www.solbridge.io/>
(Hereinafter referred to as “the Website”)

PRIVACY & GDPR POLICY

Please read this Privacy & GDPR Policy carefully before accessing, browsing, using the bridge or Website and/or participating in any Services as defined within our Terms and Conditions. It is intended for the reader of this Privacy & GDPR Policy to have an understanding of and accept the Company’s Terms and Conditions. Your access to and use of the Website is conditioned on your understanding of and compliance of this Privacy & GDPR Policy.

1. Scope

- 1.1. This Privacy Policy applies to the Company Website and Services.
- 1.2. Please note that all User access and use of the Company Website and Services conveys consent to the collection, storage, use and disclosure practices set out in this Privacy & GDPR Policy.
- 1.3. The Website Policies and legal documents may be changed or updated occasionally to meet the requirements and standards.
- 1.4. Users’ are encouraged to frequently visit the legal sections of the Website in order to be updated and remain informed about changes.
- 1.5. Modifications will be effective on the day they are posted.
- 1.6. By using our Website, you (*the visitor or User*) agree to allow third parties to process your IP address, in order to determine your location for the purpose of currency conversion. You also agree to have that currency stored in a session cookie in your browser (*a temporary cookie that gets automatically removed when you close your browser*).

2. Personal Information Collection

- 2.1. Personal Information the Company may collect from Users includes, but is not limited to;
 - 2.1.1. We do not collect Personal Identification Information.
 - 2.1.2. We do not collect information relating to the bridge, Users Assets, Wallets.
 - 2.1.3. We do not collect Online Identifiers relating to Google Analytics.
 - 2.1.4. Usage Data: *The information provided to our support team, usage of our website, authentication data, security questions, user ID, click-stream data and other data collected via cookies and similar technologies.*
- 2.2. The Website uses “cookies” in combination with similar automated techniques to collect and store information obtained from your use. A cookie is a small data file that is transferred from your device



by APYSwap Foundation

(e.g. *your phone or your computer*) for record-keeping purposes.

2.2.1. For example, a cookie may allow the Company to recognize your browser, while another could store your preferences and other information.

2.2.2. You may have an option and choose to decline the use of cookies but this will affect the parts of the Website, or they may not work at all.

3. Cookies Collection

3.1. The Company may Collect and Use Cookies for a variety of purposes, including but not limited to:

3.1.1. Administer this Website and Services,

3.1.2. Personalize the Website and Services for your use,

3.1.3. Enable your access to and use of the Website and Services,

3.1.4. Information about the computer (or other electronic device) that you use to connect to us with, the operating system it uses, your IP address, geographical location, the type of browser you use, application type, and referral source, as well as information relating to which Internet service provider or mobile network you use,

3.1.5. Data about how you use the site such as the number of page views, the particular pages and links you access when you visit the site, the specific time you access the site and the amount of time you are on it, the Website you came to our site from, the Website you visit after leaving our site, and any selections or choices you make when using the site,

3.1.6. Your individual preferences and your selections,

4. Information we Use

4.1. We use the Cookies and types of information we obtain from you in the following ways:

4.1.1. To improve your use, navigation and browsing experience on our Website,

5. Information we Share with Third Parties

5.1. We may share your information with the following third parties:

5.1.1. To third parties in order to exercise or defend our legal rights, property or safety or the rights, property or safety of others. This also includes disclosure of your personal information to others for the purposes of detecting and investigating illegal activities and breaches of any agreement we have with you,

5.1.2. With Google Analytics for the purposes of collating statistical information about our users and their behaviour, while all data collected shall strictly remain under the control of the Company Data. The Company shall not pass to any third party for analysis. Our Users cannot be personally identified from this information.

6. Securing your Data

6.1. The Company will take reasonable organisational and technical precautions to prevent the loss, alterations or any misuse of your personal information.

6.2. The Company Website and Services; while storing your data will take all commercially reasonable

steps in storing all personal information you provide on its secure servers.

6.3. Information relating to electronic transactions entered via this Website will be protected by proper encryption technology that is consistent with industry best practices.

6.3.1. Notwithstanding the foregoing, please note that our Website and Services are operated on software, hardware and networks, any component of which may, from time to time, experience breaches of security or other problems beyond our control and that may compromise the security of information collected about our users.

6.4. The Company cannot guarantee that any information will be absolutely safe from intrusion by others who do not have your authorization because of the tricky nature of the internet itself and role of other third-parties. Any such transmission of information about you to the Company is at your own risk.

7. Cross-border Data

7.1. Information that The Company collects may be stored and processed in and transferred between any of the countries in which The Company operates to enable the use of the information in accordance with this privacy policy.

7.2. In addition, personal information that you submit for publication on the Website for the public will be published on the internet and may be available around the world.

7.3. You agree to such cross-border transfers of personal information.

8. Records

8.1. The Company reserves the right to monitor all online sessions for quality control purposes and Technical Support perspective, in addition to all other purposes as needed by the Company.

8.2. The Company may record on-line and off-line communications conducted in any capacity or form with reference to assisting in the resolution of disputes and/or potential complaints.

8.3. All records will also be used to improve the Service, build a support knowledge base, and/or conduct internal market research. Recorded data will not be correlated with personally identifiable data about individual customers.

9. Minors

9.1. Our Websites and Services are not intended to appeal to persons under 18 years old ("Minors"). The Company will take appropriate steps to delete any unauthorised private information of a child that has been collected if it is discovered that such has been inadvertently collected.

9.2. All Users must be at least 18 years of age to participate in the Company's Services.

9.3. All Users that represent that they are under the age of majority in their state, province or country of residence require signed consent from their Legal Guardian.

10. Security

10.1. This Website takes every precaution to protect the information of users. When the user submits sensitive information via the Website, user information is protected both online and off- line.

- 10.2. When our registration form asks the user to enter sensitive information (such as credit card number), the information is encrypted and is protected with the best of the encryption software.
- 10.3. The Company continually monitors the Website and any corresponding Websites, ensuring all matters are dealt with, and everything is secure and protected. If we suspect anything then we will urgently pass any relevant information to the law enforcement.
- 10.4. All employees are required to be up-to-date on our security and privacy practices. Every quarter, as well as any time new policies are added.
- 10.5. The servers that we store personally identifiable information on are kept in a secure environment. In situations that are required by law, we may disclose some information about our users to law-enforcement officers.

11. Scam Prevention

- 11.1. The Company holds no Responsibility or Liability in the case of any scam.
- 11.2. No User should communicate or use any methods outside of the Company's recommendations, as to prevent scams.
- 11.3. With common sense, usage of online sources and preventive measures, you should be able to be safe online.

12. Third-party links

- 12.1. From time to time we may include links on our Website to third parties such as Etherscan. If you choose to click on these links please note that we are not responsible or liable for their policies. It is your responsibility to read their policies before you choose to engage with those Website

13. Identity Theft

- 13.1. The Company holds no responsibility or liability in the case of any Identity Theft.
- 13.2. No User should Communicate or use any methods outside of the Website systems, as to prevent scams.
- 13.3. With common sense, usage of online sources and preventive measures, you should be able to be safe online.

14. Your Rights

- 14.1. By using our Website we assume your agreement to this Privacy & GPDR policy.
- 14.2. If you do not wish for your personal data to be used as set out in this policy, you may write to us at info@solbridge.io

GDPR POLICY

This GDPR section covers all Users natural rights arising from all related European GDPR Regulation, with emphasis on GDPR Article 12; Art. 12 GDPR Transparent information, communication and modalities for the exercise of the rights of the data subject, Article 13; Information to be provided where personal data are collected from the data subject and Article 14; Information to be provided where personal data have not been

obtained from the data subject.

1. Users Data Protection Rights

- 1.1. Our Company wishes to ensure that all Users and Individuals subject to Data Collection have a full understanding of their rights and their entitlements;
 - 1.1.1. Right of Access: All Users have the right to request copies of personal data.
 - 1.1.1.1. The Company will charge you a small and reasonable fee for this service.
 - 1.1.2. Right of Rectification: All Users have the right to request that our Company correct any information you believe is inaccurate.
 - 1.1.2.1. Users also have the right to request that the Company complete any information the User believes is incomplete.
 - 1.1.3. Right of Erasure: Users can contact the Company to enforce their Right of Erasure.
 - 1.1.4. Right to Restrict Processing: Users have the right to request that the Company restrict the processing of Personal data, under certain conditions.
 - 1.1.5. Right to Object to Processing: Users have the right to object to the Company's processing of the Users personal data, under certain conditions.
 - 1.1.6. Right to Data Portability: Users have the right to request that the Company transfer all personal data collected to another organization, or directly to the User, under certain conditions.
- 1.2. Upon a User making a request, the Company reserves the right to respond within 1 (*one*) month of receiving notice.
- 1.3. To exercise your GDPR rights please feel free to contact us immediately.

2. Cookies

- 2.1. Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our Website, we may collect information from you automatically through cookies or similar technology
- 2.2. The Company uses cookies in a range of ways to improve your experience on our website.

3. External Websites & GDPR

- 3.1. The Company Website may contain links to other Websites, our GDPR Policy applies only to the Company Website.
 - 3.1.1. Upon clicking on a link to an External Website, all Users should read their legal policies.

4. Updates

- 4.1. Our Company keeps its GDPR Policy under regular review and places any updates on this web page.
- 4.2. This GDPR Policy was last updated on 4th April 2021.

5. Contact

5.1. Users can contact the Company at any time using the dedicated Contact sections on the Website.

6. Authorities

- 6.1. If Users wish to file a report or complaint upon our Company not addressing your GDPR rights in a satisfactory commission, please contact your jurisdictions Information Commissioner Office.